

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) CR. NO. 04-10148-RCL
)
 v.)
)
 SHAWN SANDLER)
)

JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(C)

Pursuant to Local Rule 116.5(C), the United States and Defendant Shawn Sandler (collectively, the "parties") state as follows:

(1) The defendant requests three weeks to file a request for discovery.

(2) The government anticipates providing additional discovery regarding expert witnesses.

(3) The defendant does not intend to raise a defense of insanity or public authority.

(4) The government has not requested notice of an alibi by the defendant.

(5-6) The defendant may file one or more motions to suppress and requests that a briefing schedule be set.

(7) The parties presently believe the case will proceed to trial.

(8) The parties estimate that the trial will last approximately five to seven trial days.

SHAWN SANDLER
By His Attorney

MICHAEL J. SULLIVAN
United States Attorney

By:

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August 23, 2004